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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JEFF NARDINELLI**

1 I, Jeffrey W. Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this  
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and  
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct copy of excerpts of the deposition of  
7 Pierre Droz, taken August 22, 2017.

8 3. Attached as Exhibit 2 is a true and correct copy of an email sent by Lindsay Cooper  
9 on June 12, 2017. This email was the production email for the production set including  
10 WAYMO-UBER-00006391.

11 4. On September 6, 2017, I opened the transcript of Pierre Droz's August 3 deposition  
12 using Adobe Acrobat. I verified that the transcript was text-searchable. I then searched the 442-  
13 page transcript for the following terms: *tyto*; *odin*; *oden*. Each search returned zero hits.

14 I declare under penalty of perjury under the laws of the State of California that the  
15 foregoing is true and correct.

16 DATED: September 7, 2017

17 /s/ Jeff Nardinelli  
Jeff Nardinelli

18  
19 **SIGNATURE ATTESTATION**

20 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
21 filing of this document has been obtained from Jeff Nardinelli.

22  
23 /s/ Charles K. Verhoeven  
Charles K. Verhoeven  
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